

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION**

**ALVA JOHNSON,
Individually and On Behalf of All Others
Similarly Situated,**

Plaintiff,

Case No. 8:19-cv-00475-WFJ-SPF

v.

**DONALD J. TRUMP,
In his Individual Capacity and
DONALD J. TRUMP FOR
PRESIDENT, INC.**

Defendants.

**DEFENDANT DONALD J. TRUMP'S
ANSWER AND AFFIRMATIVE DEFENSES TO PLAINTIFF'S COMPLAINT**

Defendant Donald J. Trump ("Mr. Trump") hereby files his Answer and Affirmative Defenses to plaintiff Alva Johnson's ("Plaintiff") Complaint in this action. Mr. Trump's Answer corresponds sequentially to the paragraphs in Plaintiff's Complaint.

ANSWER

1. Mr. Trump admits the allegation that he is the President of the United States and that Plaintiff has brought this lawsuit against him. The remaining allegations in this paragraph are scandalous, immaterial, impertinent and prejudicial, and are the subject of the concurrently filed Motion to Strike by Mr. Trump and defendant Donald J. Trump for President, Inc. (the "Motion to Strike"). On this basis, Mr. Trump denies the remaining allegations in this paragraph, but will amend this response if ordered to do so by the Court following its ruling on the Motion to Strike.

2. The allegations in this paragraph are scandalous, immaterial, impertinent and prejudicial, and are the subject of the Motion to Strike. On this basis, Mr. Trump denies the allegations in this paragraph, but will amend this response if ordered to do so by the Court following its ruling on the Motion to Strike.

3. Mr. Trump denies the allegations related to the alleged kiss and his alleged treatment of Plaintiff. Mr. Trump is without sufficient knowledge or information regarding Plaintiff's accomplishments or role with defendant Donald J. Trump for President, Inc. (the "Campaign"), and on that basis denies the allegations related thereto. The remaining allegations in this paragraph are scandalous, immaterial, impertinent and prejudicial, and are the subject of the Motion to Strike. On this basis, Mr. Trump denies the remaining allegations in this paragraph, but will amend this response if ordered to do so by the Court following its ruling on the Motion to Strike.

4. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

5. Mr. Trump denies the allegation that he forcibly kissed Plaintiff. Mr. Trump admits that Plaintiff has brought a lawsuit against him for battery. Mr. Trump is without sufficient knowledge or information regarding Plaintiff's role with the Campaign or her state of mind, and on that basis denies the allegations related thereto. The remaining allegations in this paragraph are scandalous, immaterial, impertinent and prejudicial, and are the subject of the Motion to Strike. On this basis, Mr. Trump denies the remaining allegations in this paragraph, but will amend this response if ordered to do so by the Court following its ruling on the Motion to Strike.

6. Mr. Trump denies the allegation that he forcibly kissed Plaintiff or that Mr. Trump was Plaintiff's "boss." Mr. Trump admits that Plaintiff has brought a lawsuit against the Campaign related to her alleged pay. Mr. Trump is without sufficient knowledge or information regarding the remaining allegations in this paragraph, and on that basis denies the remaining allegations.

7. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

8. Mr. Trump admits the allegation in this paragraph.

9. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

10. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

11. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

12. Mr. Trump denies the allegation that he committed a tortious act in the state of Florida. Mr. Trump admits the remaining allegations.

13. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

14. The allegations in this paragraph are scandalous, immaterial, impertinent and prejudicial, and are the subject of the Motion to Strike. On this basis, Mr. Trump denies the allegations in this paragraph, but will amend this response if ordered to do so by the Court following its ruling on the Motion to Strike.

15. Mr. Trump denies the allegation that Plaintiff was subjected to unwanted kissing by Mr. Trump or that he was Plaintiff's "boss." Mr. Trump is without sufficient knowledge or information regarding Plaintiff's role with the Campaign, and on that basis denies the allegations related thereto. The remaining allegations in this paragraph are scandalous, immaterial, impertinent and prejudicial, and are the subject of the Motion to Strike. On this basis, Mr. Trump denies the remaining allegations in this paragraph, but will amend this response if ordered to do so by the Court following its ruling on the Motion to Strike.

16. Mr. Trump denies the allegation that he forcibly kissed Plaintiff. Mr. Trump is without sufficient knowledge or information regarding the remaining allegations in this paragraph, and on that basis denies the remaining allegations.

17. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

18. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

19. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

20. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

21. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

22. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

23. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

24. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

25. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

26. Mr. Trump denies the allegations in this paragraph.

27. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

28. Mr. Trump denies the allegation of an “unconformable interaction” between Mr. Trump and Plaintiff. Mr. Trump is without sufficient knowledge or information regarding Plaintiff’s role with the Campaign or her state of mind, and on that basis denies the allegations related thereto. The remaining allegations in this paragraph are scandalous, immaterial, impertinent and prejudicial, and are the subject of the Motion to Strike. On this basis, Mr. Trump denies the remaining allegations in this paragraph, but will amend this response if ordered to do so by the Court following its ruling on the Motion to Strike.

29. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

30. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

31. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

32. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

33. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

34. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

35. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

36. Mr. Trump admits the allegation that Jeff Sessions endorsed Mr. Trump at a February 2016 rally in Madison, Alabama. Mr. Trump is without sufficient knowledge or information regarding the remaining allegations in this paragraph, and on that basis denies the remaining allegations.

37. Mr. Trump admits the allegations in this paragraph.

38. Mr. Trump admits that he won the Alabama Republican Presidential Primary on March 1, 2016. Mr. Trump is without sufficient knowledge or information regarding the remaining allegations in this paragraph, and on that basis denies the remaining allegations.

39. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

40. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

41. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

42. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

43. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

44. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

45. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

46. Mr. Trump admits that he won the 2016 Republican Presidential Primaries in California, Illinois, Missouri and Indiana. Mr. Trump is without sufficient knowledge or information regarding the remaining allegations in this paragraph, and on that basis denies the remaining allegations.

47. Mr. Trump admits that he formally received the Republican nomination for president in July 2016. Mr. Trump is without sufficient knowledge or information regarding the remaining allegations in this paragraph, and on that basis denies the remaining allegations.

48. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

49. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

50. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

51. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

52. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

53. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

54. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

55. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

56. Mr. Trump admits the allegation that he attended a rally in Tampa, Florida on August 24, 2016 and met with individuals inside an RV on that date. Mr. Trump is without sufficient knowledge or information as to whether these individuals were volunteers or staff for the Campaign, or whether the meeting was prior to the rally, and on that basis denies the allegations related thereto. Mr. Trump denies the allegation that he forcibly kissed Plaintiff.

57. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

58. Mr. Trump admits that Pamela Jo Bondi and Karen Giorno were present in the RV. Mr. Trump is without sufficient knowledge or information regarding the remaining allegations in this paragraph, and on that basis denies the remaining allegations.

59. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

60. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

61. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

62. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

63. Mr. Trump denies the allegation that he “grasped her hand and did not let go.” Mr. Trump is without sufficient knowledge or information regarding the remaining allegations in this paragraph, and on that basis denies the remaining allegations.

64. Mr. Trump denies the allegations in this paragraph.

65. Mr. Trump denies the allegations in this paragraph.

66. Mr. Trump denies the allegations in this paragraph except for the allegation that Plaintiff was wearing a baseball cap, which might have been the case, but is likely irrelevant.

67. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

68. Mr. Trump denies that he caused Plaintiff to feel “shock[ed],” “confused” or “humiliated.” Mr. Trump is without sufficient knowledge or information regarding the remaining allegations in this paragraph, and on that basis denies the remaining allegations.

69. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

70. Mr. Trump denies the allegation that he kissed Plaintiff on the mouth. Mr. Trump is without sufficient knowledge or information regarding the remaining allegations in this paragraph, and on that basis denies the remaining allegations.

71. Mr. Trump denies the allegation that he kissed Plaintiff on the mouth. Mr. Trump is without sufficient knowledge or information regarding the remaining allegations in this

paragraph, and on that basis denies the remaining allegations.

72. Mr. Trump denies the allegation that he kissed Plaintiff on the mouth. Mr. Trump is without sufficient knowledge or information regarding the remaining allegations in this paragraph, and on that basis denies the remaining allegations.

73. Mr. Trump denies the allegation that he kissed Plaintiff on the mouth or that Mr. Trump was Plaintiff's "boss." Mr. Trump is without sufficient knowledge or information regarding the remaining allegations in this paragraph, and on that basis denies the remaining allegations.

74. Mr. Trump denies the allegation that he kissed Plaintiff on the mouth. Mr. Trump is without sufficient knowledge or information regarding the remaining allegations in this paragraph, and on that basis denies the remaining allegations.

75. Mr. Trump denies that he forcibly kissed Plaintiff. Mr. Trump admits that *The Washington Post* published an article regarding an alleged 2005 conversation between Mr. Trump and Billy Bush. Mr. Trump is without sufficient knowledge or information regarding the date this article was published, and on that basis denies the allegations related thereto.

76. Mr. Trump admits that a purported recording of an alleged 2005 conversation between Mr. Trump and Bill Bush was released to the general public on or about October 7, 2016. Mr. Trump is without sufficient knowledge or information regarding who released this purported recording, and on that basis denies the allegations related thereto. The remaining allegations in this paragraph are scandalous, immaterial, impertinent and prejudicial, and are the subject of the Motion to Strike. On this basis, Mr. Trump denies the remaining allegations in this paragraph, but will amend this response if ordered to do so by the Court following its ruling on the Motion to Strike.

77. Mr. Trump denies the allegation that he forcibly kissed Plaintiff. Mr. Trump is without sufficient knowledge or information regarding the remaining allegations in this paragraph, and on that basis denies the remaining allegations.

78. Mr. Trump denies the allegation that he forcibly kissed Plaintiff. Mr. Trump is without sufficient knowledge or information regarding the remaining allegations in this paragraph, and on that basis denies the remaining allegations.

79. Mr. Trump denies the allegation that he forcibly kissed Plaintiff. Mr. Trump is without sufficient knowledge or information regarding Plaintiff's state of mind, and on that basis denies the allegations related thereto. The remaining allegations in this paragraph are scandalous, immaterial, impertinent and prejudicial, and are the subject of the Motion to Strike. On this basis, Mr. Trump denies the remaining allegations in this paragraph, but will amend this response if ordered to do so by the Court following its ruling on the Motion to Strike.

80. Mr. Trump is without sufficient knowledge or information regarding Plaintiff's state of mind or work with the Campaign, and on that basis denies the allegations related thereto. The remaining allegations in this paragraph are scandalous, immaterial, impertinent and prejudicial, and are the subject of the Motion to Strike. On this basis, Mr. Trump denies the remaining allegations in this paragraph, but will amend this response if ordered to do so by the Court following its ruling on the Motion to Strike.

81. Mr. Trump denies the allegation that he forcibly kissed Plaintiff. Mr. Trump is without sufficient knowledge or information regarding Plaintiff's state of mind, and on that basis denies the allegations related thereto. The remaining allegations in this paragraph are scandalous, immaterial, impertinent and prejudicial, and are the subject of the Motion to Strike. On this basis, Mr. Trump denies the remaining allegations in this paragraph, but will amend this

response if ordered to do so by the Court following its ruling on the Motion to Strike.

82. Mr. Trump denies the allegation that he forcibly kissed Plaintiff. Mr. Trump is without sufficient knowledge or information regarding the remaining allegations in this paragraph, and on that basis denies the remaining allegations.

83. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

84. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

85. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

86. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

(a) Mr. Trump denies the allegation that he forcibly kissed Plaintiff or that he caused her emotional distress. Mr. Trump is without sufficient knowledge or information regarding the remaining allegations in this paragraph, and on that basis denies the remaining allegations.

(b) Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

(c) Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

87. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

88. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

89. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

90. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

91. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

92. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

93. Mr. Trump denies the allegation that he forcibly kissed Plaintiff or caused her emotional distress. Mr. Trump is without sufficient knowledge or information regarding the remaining allegations in this paragraph, and on that basis denies the remaining allegations.

94. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

95. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

96. Mr. Trump is without sufficient knowledge or information regarding Plaintiff's state of mind, and on that basis denies the allegations related thereto. The remaining allegations in this paragraph are scandalous, immaterial, impertinent and prejudicial, and are the subject of the Motion to Strike. On this basis, Mr. Trump denies the remaining allegations in this paragraph, but will amend this response if ordered to do so by the Court following its ruling on the Motion to Strike.

97. The allegations in this paragraph are scandalous, immaterial, impertinent and prejudicial, and are the subject of the Motion to Strike. On this basis, Mr. Trump denies the allegations in this paragraph, but will amend this response if ordered to do so by the Court following its ruling on the Motion to Strike.

98. The allegations in this paragraph are scandalous, immaterial, impertinent and prejudicial, and are the subject of the Motion to Strike. On this basis, Mr. Trump denies the allegations in this paragraph, but will amend this response if ordered to do so by the Court following its ruling on the Motion to Strike.

99. The allegations in this paragraph are scandalous, immaterial, impertinent and prejudicial, and are the subject of the Motion to Strike. On this basis, Mr. Trump denies the allegations in this paragraph, but will amend this response if ordered to do so by the Court following its ruling on the Motion to Strike.

100. The allegations in this paragraph are scandalous, immaterial, impertinent and prejudicial, and are the subject of the Motion to Strike. On this basis, Mr. Trump denies the allegations in this paragraph, but will amend this response if ordered to do so by the Court following its ruling on the Motion to Strike.

101. The allegations in this paragraph are scandalous, immaterial, impertinent and prejudicial, and are the subject of the Motion to Strike. On this basis, Mr. Trump denies the allegations in this paragraph, but will amend this response if ordered to do so by the Court following its ruling on the Motion to Strike.

(a) The allegations in this paragraph are scandalous, immaterial, impertinent and prejudicial, and are the subject of the Motion to Strike. On this basis, Mr. Trump denies the allegations in this paragraph, but will amend this response if ordered to do so

by the Court following its ruling on the Motion to Strike.

(b) The allegations in this paragraph are scandalous, immaterial, impertinent and prejudicial, and are the subject of the Motion to Strike. On this basis, Mr. Trump denies the allegations in this paragraph, but will amend this response if ordered to do so by the Court following its ruling on the Motion to Strike.

(c) The allegations in this paragraph are scandalous, immaterial, impertinent and prejudicial, and are the subject of the Motion to Strike. On this basis, Mr. Trump denies the allegations in this paragraph, but will amend this response if ordered to do so by the Court following its ruling on the Motion to Strike.

(d) The allegations in this paragraph are scandalous, immaterial, impertinent and prejudicial, and are the subject of the Motion to Strike. On this basis, Mr. Trump denies the allegations in this paragraph, but will amend this response if ordered to do so by the Court following its ruling on the Motion to Strike.

(e) The allegations in this paragraph are scandalous, immaterial, impertinent and prejudicial, and are the subject of the Motion to Strike. On this basis, Mr. Trump denies the allegations in this paragraph, but will amend this response if ordered to do so by the Court following its ruling on the Motion to Strike.

(f) The allegations in this paragraph are scandalous, immaterial, impertinent and prejudicial, and are the subject of the Motion to Strike. On this basis, Mr. Trump denies the allegations in this paragraph, but will amend this response if ordered to do so by the Court following its ruling on the Motion to Strike.

(g) The allegations in this paragraph are scandalous, immaterial, impertinent and prejudicial, and are the subject of the Motion to Strike. On this basis, Mr. Trump

denies the allegations in this paragraph, but will amend this response if ordered to do so by the Court following its ruling on the Motion to Strike.

(h) The allegations in this paragraph are scandalous, immaterial, impertinent and prejudicial, and are the subject of the Motion to Strike. On this basis, Mr. Trump denies the allegations in this paragraph, but will amend this response if ordered to do so by the Court following its ruling on the Motion to Strike.

102. The allegations in this paragraph are scandalous, immaterial, impertinent and prejudicial, and are the subject of the Motion to Strike. On this basis, Mr. Trump denies the allegations in this paragraph, but will amend this response if ordered to do so by the Court following its ruling on the Motion to Strike.

103. The allegations in this paragraph are scandalous, immaterial, impertinent and prejudicial, and are the subject of the Motion to Strike. On this basis, Mr. Trump denies the allegations in this paragraph, but will amend this response if ordered to do so by the Court following its ruling on the Motion to Strike.

(a) The allegations in this paragraph are scandalous, immaterial, impertinent and prejudicial, and are the subject of the Motion to Strike. On this basis, Mr. Trump denies the allegations in this paragraph, but will amend this response if ordered to do so by the Court following its ruling on the Motion to Strike.

(b) The allegations in this paragraph are scandalous, immaterial, impertinent and prejudicial, and are the subject of the Motion to Strike. On this basis, Mr. Trump denies the allegations in this paragraph, but will amend this response if ordered to do so by the Court following its ruling on the Motion to Strike.

(c) The allegations in this paragraph are scandalous, immaterial, impertinent and prejudicial, and are the subject of the Motion to Strike. On this basis, Mr. Trump denies the allegations in this paragraph, but will amend this response if ordered to do so by the Court following its ruling on the Motion to Strike.

(d) The allegations in this paragraph are scandalous, immaterial, impertinent and prejudicial, and are the subject of the Motion to Strike. On this basis, Mr. Trump denies the allegations in this paragraph, but will amend this response if ordered to do so by the Court following its ruling on the Motion to Strike.

(e) The allegations in this paragraph are scandalous, immaterial, impertinent and prejudicial, and are the subject of the Motion to Strike. On this basis, Mr. Trump denies the allegations in this paragraph, but will amend this response if ordered to do so by the Court following its ruling on the Motion to Strike.

(f) The allegations in this paragraph are scandalous, immaterial, impertinent and prejudicial, and are the subject of the Motion to Strike. On this basis, Mr. Trump denies the allegations in this paragraph, but will amend this response if ordered to do so by the Court following its ruling on the Motion to Strike.

(g) The allegations in this paragraph are scandalous, immaterial, impertinent and prejudicial, and are the subject of the Motion to Strike. On this basis, Mr. Trump denies the allegations in this paragraph, but will amend this response if ordered to do so by the Court following its ruling on the Motion to Strike.

(h) The allegations in this paragraph are scandalous, immaterial, impertinent and prejudicial, and are the subject of the Motion to Strike. On this basis, Mr. Trump denies the allegations in this paragraph, but will amend this response if ordered to do so

by the Court following its ruling on the Motion to Strike.

(i) The allegations in this paragraph are scandalous, immaterial, impertinent and prejudicial, and are the subject of the Motion to Strike. On this basis, Mr. Trump denies the allegations in this paragraph, but will amend this response if ordered to do so by the Court following its ruling on the Motion to Strike.

(j) The allegations in this paragraph are scandalous, immaterial, impertinent and prejudicial, and are the subject of the Motion to Strike. On this basis, Mr. Trump denies the allegations in this paragraph, but will amend this response if ordered to do so by the Court following its ruling on the Motion to Strike.

104. The allegations in this paragraph are scandalous, immaterial, impertinent and prejudicial, and are the subject of the Motion to Strike. On this basis, Mr. Trump denies the allegations in this paragraph, but will amend this response if ordered to do so by the Court following its ruling on the Motion to Strike.

105. The allegations in this paragraph are scandalous, immaterial, impertinent and prejudicial, and are the subject of the Motion to Strike. On this basis, Mr. Trump denies the allegations in this paragraph, but will amend this response if ordered to do so by the Court following its ruling on the Motion to Strike.

106. The allegations in this paragraph are scandalous, immaterial, impertinent and prejudicial, and are the subject of the Motion to Strike. On this basis, Mr. Trump denies the allegations in this paragraph, but will amend this response if ordered to do so by the Court following its ruling on the Motion to Strike.

107. The allegations in this paragraph are scandalous, immaterial, impertinent and prejudicial, and are the subject of the Motion to Strike. On this basis, Mr. Trump denies the

allegations in this paragraph, but will amend this response if ordered to do so by the Court following its ruling on the Motion to Strike.

108. The allegation in this paragraph of a “pattern of identical conduct” is scandalous, immaterial, impertinent and prejudicial, and is the subject of the Motion to Strike. On this basis, Mr. Trump denies this allegation, but will amend this response if ordered to do so by the Court following its ruling on the Motion to Strike. Mr. Trump denies the remaining allegations in this paragraph.

109. Mr. Trump denies the allegations in this paragraph.

110. Mr. Trump denies that he forcibly kissed Plaintiff. Mr. Trump is without sufficient knowledge or information regarding the remaining allegations in this paragraph, and on that basis denies these allegations.

111. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

112. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

(a) Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

(b) Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

(c) Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

(d) Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

(e) Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

113. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

114. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

115. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

116. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

117. Mr. Trump admits that he described a February 2016 rally in Madison, Alabama as “the biggest crowd of the political season bar far.” Mr. Trump is without sufficient knowledge or information regarding the remaining allegations in this paragraph, and on that basis denies the remaining allegations.

118. Mr. Trump is without sufficient knowledge or information regarding the allegations related to the Campaign in this paragraph, and on that basis denies these allegations. Mr. Trump denies the remaining allegations in this paragraph.

119. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

120. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

121. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

122. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

123. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

124. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

125. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

(a) Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

(b) Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

(c) Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

(d) Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

126. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

127. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

128. Mr. Trump incorporates his answers in paragraphs 1 through 119 above, as if fully rewritten herein.

129. Mr. Trump admits the allegation that he attended a rally in Tampa, Florida on August 24, 2016 and met with individuals inside an RV on that date. Mr. Trump is without sufficient knowledge or information as to whether these individuals were volunteers or supporters, or whether the meeting was prior to the rally, and on that basis denies the allegations related thereto. Mr. Trump denies the remaining allegations in this paragraph.

130. Mr. Trump denies the allegations in this paragraph.

131. Mr. Trump denies the allegations in this paragraph.

132. Mr. Trump denies the allegations in this paragraph.

133. Mr. Trump denies that Plaintiff is entitled to any of the relief requested in this paragraph. Mr. Trump further denies that he caused any damages to Plaintiff.

134. Mr. Trump incorporates his answers in paragraphs 1 through 127 above, as if fully rewritten herein.

135. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

136. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

137. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

138. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

139. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

140. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

141. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

142. Mr. Trump incorporates his answers in paragraphs 1 through 119 above, as if fully rewritten herein.

143. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

144. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

145. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

146. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

147. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

148. Mr. Trump is without sufficient knowledge or information regarding the allegations in this paragraph, and on that basis denies these allegations.

Prayer for Relief

1. Mr. Trump denies that Plaintiff is entitled to the relief requested in this paragraph.
2. Mr. Trump denies that Plaintiff is entitled to the relief requested in this paragraph.
3. Mr. Trump denies that Plaintiff is entitled to the relief requested in this paragraph.
4. Mr. Trump denies that Plaintiff is entitled to the relief requested in this paragraph.

5. Mr. Trump denies that Plaintiff is entitled to the relief requested in this paragraph.

6. Mr. Trump denies that Plaintiff is entitled to the relief requested in this paragraph.

7. Mr. Trump is without sufficient knowledge or information regarding the allegations relating to Plaintiff's claims against the Campaign, and on that basis denies that Plaintiff is entitled to the relief requested in this paragraph.

8. Mr. Trump is without sufficient knowledge or information regarding the allegations relating to Plaintiff's claims against the Campaign, and on that basis denies that Plaintiff is entitled to the relief requested in this paragraph.

9. Mr. Trump is without sufficient knowledge or information regarding the allegations relating to Plaintiff's claims against the Campaign, and on that basis denies that Plaintiff is entitled to the relief requested in this paragraph.

10. Mr. Trump is without sufficient knowledge or information regarding the allegations relating to Plaintiff's claims against the Campaign, and on that basis denies that Plaintiff is entitled to the relief requested in this paragraph.

11. Mr. Trump is without sufficient knowledge or information regarding the allegations relating to Plaintiff's claims against the Campaign, and on that basis denies that Plaintiff is entitled to the relief requested in this paragraph.

12. Mr. Trump is without sufficient knowledge or information regarding the allegations relating to Plaintiff's claims against the Campaign, and on that basis denies that Plaintiff is entitled to the relief requested in this paragraph.

13. Mr. Trump is without sufficient knowledge or information regarding the allegations relating to Plaintiff's claims against the Campaign, and on that basis denies that Plaintiff is entitled to the relief requested in this paragraph.

14. Mr. Trump is without sufficient knowledge or information regarding the allegations relating to Plaintiff's claims against the Campaign, and on that basis denies that Plaintiff is entitled to the relief requested in this paragraph.

15. Mr. Trump is without sufficient knowledge or information regarding the allegations relating to Plaintiff's claims against the Campaign, and on that basis denies that Plaintiff is entitled to the relief requested in this paragraph.

16. Mr. Trump is without sufficient knowledge or information regarding the allegations relating to Plaintiff's claims against the Campaign, and on that basis denies that Plaintiff is entitled to the relief requested in this paragraph.

17. Mr. Trump is without sufficient knowledge or information regarding the allegations relating to Plaintiff's claims against the Campaign, and on that basis denies that Plaintiff is entitled to the relief requested in this paragraph.

18. Mr. Trump is without sufficient knowledge or information regarding the allegations relating to Plaintiff's claims against the Campaign, and on that basis denies that Plaintiff is entitled to the relief requested in this paragraph.

19. Mr. Trump is without sufficient knowledge or information regarding the allegations relating to Plaintiff's claims against the Campaign, and on that basis denies that Plaintiff is entitled to the relief requested in this paragraph.

20. Mr. Trump is without sufficient knowledge or information regarding the allegations relating to Plaintiff's claims against the Campaign, and on that basis denies that Plaintiff is entitled to the relief requested in this paragraph.

21. Mr. Trump is without sufficient knowledge or information regarding the allegations relating to Plaintiff's claims against the Campaign, and on that basis denies that

Plaintiff is entitled to the relief requested in this paragraph.

22. Mr. Trump is without sufficient knowledge or information regarding the allegations relating to Plaintiff's claims against the Campaign, and on that basis denies that Plaintiff is entitled to the relief requested in this paragraph.

23. Mr. Trump is without sufficient knowledge or information regarding the allegations relating to Plaintiff's claims against the Campaign, and on that basis denies that Plaintiff is entitled to the relief requested in this paragraph.

Investigation and discovery is ongoing, and Mr. Trump reserves the right to amend his responses to the allegations in the Complaint.

AFFIRMATIVE DEFENSES

First Affirmative Defense

(No Harmful or Offensive Conduct)

Plaintiff's Complaint against Mr. Trump is barred, in whole or in part, on the grounds that no harmful or offensive conduct occurred between Mr. Trump and Plaintiff.

Second Affirmative Defense

(Failure to State a Claim)

Plaintiff's Complaint against Mr. Trump is barred, in whole or in part, on the grounds that Plaintiff has failed to state facts sufficient to constitute a cause of action against Mr. Trump.

Third Affirmative Defense

(Statute of Limitations)

Plaintiff's Complaint against Mr. Trump is barred, in whole or in part, by the applicable statute of limitations, including but not limited to Florida Statutes § 95.11.

Fourth Affirmative Defense

(Unclean Hands)

Plaintiff's Complaint against Mr. Trump is barred, in whole or in part, by the doctrine of unclean hands.

Fifth Affirmative Defense

(Estoppel)

Plaintiff's Complaint against Mr. Trump is barred, in whole or in part, by the doctrine of estoppel.

Sixth Affirmative Defense

(Waiver)

Plaintiff's Complaint against Mr. Trump is barred, in whole or in part, by the doctrine of waiver.

Seventh Affirmative Defense

(Laches)

Plaintiff's Complaint against Mr. Trump is barred, in whole or in part, by the doctrine of laches.

Eighth Affirmative Defense

(Unjust Enrichment)

Plaintiff's Complaint against Mr. Trump is barred, in whole or in part, on the grounds that Plaintiff would be unjustly enriched if allowed to recover on any of the allegations set forth against Mr. Trump in the Complaint.

Ninth Affirmative Defense

(Improper Damages/Relief)

Plaintiff's Complaint against Mr. Trump is barred, in whole or in part, on the grounds that Plaintiff is seeking damages/relief above and/or beyond what is permitted under the applicable law.

Tenth Affirmative Defense

(Justification/Excuse)

Plaintiff's Complaint against Mr. Trump is barred, in whole or in part, on the grounds that the acts or omissions by Mr. Trump, if any, were justified and/or excused.

Eleventh Affirmative Defense

(Consent)

Plaintiff's Complaint against Mr. Trump is barred, in whole or in part, on the grounds that the acts or omissions by Mr. Trump, if any, were consented to by Plaintiff.

Twelfth Affirmative Defense

(Reservation of Additional Defenses)

Mr. Trump hereby reserves the right to assert any additional defenses, including affirmative defenses, available at law or in equity, that may now exist or in the future be available based upon discovery and further factual investigation in this case.

[signature on next page]

Dated this 10th day of May, 2019

Respectfully Submitted,

/s/ Charles J. Harder

Charles J. Harder

Trial Counsel

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Admitted *Pro Hac Vice*

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Donald J. Trump for President, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 10, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will electronically send a notice of electronic filing upon the following:

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